

David Barrett

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

www.dnr.mo.gov

June 30, 2004

CERTIFIED MAIL – 7003 0500 0002 3723 9700
RETURN RECEIPT REQUESTED

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RCRA RECORDS

Mr. Thomas S. Sanicola
Environmental Engineer
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403-2552

RE: Resource Conservation and Recovery Act (RCRA) Corrective Action
Technical Memorandum, Modine Manufacturing Company
Camdenton, Missouri, EPA ID# MOD062439351

Dear Mr. Sanicola:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has reviewed the document entitled *RCRA Corrective Action, Technical Memorandum*, Modine Manufacturing Company, Camdenton, Missouri, dated July 9, 2002.

The memorandum discusses the removal of contaminated soils west of the manufacturing building as an interim measure. Soils above site-specific clean-up levels were excavated and disposed of off-site at Allied Waste Landfill in Jefferson City as a special waste. These contaminated soils had previously been determined to be a potential source of groundwater contamination due to leaching via infiltrating precipitation. The report also discusses results of the confirmatory soil samples that were collected to determine the extent of excavated soil. The department has determined that the interim measure adequately addresses the issue of contaminated soils, west of the manufacturing building, and that the residual levels of contaminants in soil remaining on-site directly adjacent to the excavated area does not constitute a significant source for continued leaching of contaminants to groundwater.

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The memorandum recommends that "no further action, neither investigative- or remedial action-related, be required of Modine." The department agrees with this conclusion as it relates to the subject area; however, it is the department's position that additional investigation may be necessary to complete the site characterization and thereby provide the basis for approval of the site-wide RCRA Facility Investigation (RFI) and satisfaction of the Consent Order requirements. As expressed in previous discussions with Modine, areas that may require additional investigation are: 1) the potential contamination source area(s) beneath the manufacturing building; and 2) potential soil contamination along off-site portions of the sewer line that formerly discharged to Hulett Lagoon. The department and Modine are actively discussing these remaining areas and the need for additional site characterization. It is the department's goal to resolve these issues as soon as possible.

The department hereby approves *the RCRA Corrective Action, Technical Memorandum* with the comments discussed in the previous paragraph. The department commends Modine for continued cooperation and coordination in working towards completion of the RFI and satisfaction of the Consent Order requirements at the Camdenton, Missouri, facility.

If you have any questions regarding this letter, feel free to contact Christine Kump-Mitchell, P.E., of my staff at the Missouri Department of Natural Resources, St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by phone at (314) 416-2960.

Sincerely,

HAZARDOUS WASTE PROGRAM



Robert K. Morrison, P.E.
Chief, Permits Section

RKM:ckm

c: Mr. David Garrett, United States Environmental Protection Agency Region VII ✓
Mr. John Hooker, SECOR
Mr. Dan Price, CH2Mhill